

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

SUSAN M. HODGES

PLAINTIFF

VS.

CAUSE NO. 1:16-CV-00033-SA-DAS

**CNCL, LLC, d/b/a
BRIAR HILL MANAGEMENT COMPANY**

DEFENDANT

PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME

COMES NOW Plaintiff, Susan M. Hodges, by and through counsel, and submits her Motion for Extension of Time in which to serve the response to Defendant's Motion for Summary Judgment [45], and would show unto the Court the following:

1. Counsel for Plaintiff has had a number of briefs and other pleadings to become due and has been unable to review the authorities and complete the research necessary for the response, currently due on April 11, 2017.

2. Additionally, Plaintiff's counsel has been out of the office a great deal since the receipt of the Defendant's motion due to his court and deposition schedule.

3. In light of the above circumstances, Plaintiff's counsel is in need of additional time, through April 25, 2017, in which to file the response.

4. The granting of additional time would be of no prejudice to the Defendant. Further, defense counsel has been contacted and states there is no objection to the Plaintiff's requested time being granted.

5. The requested extension of time is made in good faith and is not sought for the

purpose of delay or harassment.

6. Because of the simple and self-explanatory nature of the instant motion, Plaintiff requests to be relieved of any obligation to file a supporting memorandum.

WHEREFORE, Plaintiff requests that the Court grant her Unopposed Motion for Extension of Time, through and including April 25, 2017, in which to file the response to [45] Defendant's Motion for Summary Judgment.

DATED, this the 7th day of April, 2017.

Respectfully submitted,

WAIDE & ASSOCIATES, P.A.

BY: /s/ **Ron L. Woodruff**

RON L. WOODRUFF
MS BAR NO.: 100391

WAIDE & ASSOCIATES, P.A.
ATTORNEYS AT LAW
POST OFFICE BOX 1357
TUPELO, MS 38802
TELEPHONE: 662/842-7324
FACSIMILE: 662/842-8056
EMAIL: waide@waidelaw.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Ron L. Woodruff, attorney for Plaintiff, do hereby certify that I have this day electronically filed the above and foregoing with the Clerk of the Court, utilizing the ECF system, which sent notification of such filing to the following:

Adam H. Gates, Esq.
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
Post Office Box 14167
Jackson, MS 39236-4167
agates@bakerdonelson.com
ahardy@bakerdonelson.com
mprewitt@bakerdonelson.com

Adria H. Jetton, Esq.
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
Post Office Box 14167
Jackson, MS 39236-4167
ajetton@bakerdonelson.com
jpourciau@bakerdonelson.com

THIS the 7th day of April, 2017.

BY: /s/ Ron L. Woodruff
RON L. WOODRUFF